

Law Offices of Avrum J. Rosen, PLLC
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Alex E. Tsionis, Esq.
Avrum J. Rosen, Esq.

Presentment Date: July 3, 2023
Objection Deadline: June 26, 2023
Hearing on Objections, if any: July 18, 2023, at 3:30 p.m.

Proposed Counsel to the Debtor and Debtor-In-Possession

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

AJM MANAGEMENT, LLC,

Case No.: 23-41664-nhl

Debtor.

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**NOTICE OF MOTION OF DEBTOR'S APPLICATION FOR
LEAVE TO EMPLOY THE LAW OFFICES OF AVRUM J. ROSEN, PLLC
AS ATTORNEYS FOR THE DEBTOR, EFFECTIVE AS OF MAY 12, 2023**

PLEASE TAKE NOTICE, that AJM Management, LLC, the debtor and debtor in possession herein (the “Debtor”), by and through its proposed attorneys, the Law Offices of Avrum J. Rosen, PLLC, shall move by **NOTICE OF PRESENTMENT** before the Honorable Nancy Hershey Lord, United States Bankruptcy Judge, on **July 3, 2023**, or as soon thereafter as counsel may be heard, for the entry of an order, substantially in the form of the proposed order annexed hereto, retaining the Law Offices of Avrum J. Rosen, PLLC as attorneys for the Debtor effective as of May 12, 2023 (the “Application”) pursuant to sections 105, 327 and 328 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the E.D.N.Y. Local Bankruptcy Rules (the “Local Rules”).

PLEASE TAKE FURTHER NOTICE, that unless a written objection to the relief sought in the Application, with proof of service, is filed with the Clerk of the Court and a courtesy copy

is delivered to the Court at least seven (7) days before the date of presentment, there will not be a hearing and the Order may be signed.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Application must be in writing, conform with the Bankruptcy Code, the Bankruptcy Rules and the Local Rules, state with particularity the grounds therefor and be filed with the Bankruptcy Court no later than **June 26, 2023** as follows: (i) through the Court's CM/ECF system, which may be accessed through the internet at the Court's website at <https://www.nyeb.uscourts.gov/> and in portable document format (PDF) using Adobe Exchange Software for conversion; or (ii) if a party is unavailable to file electronically, such party shall submit the objection in PDF format on portable media in an envelope with the case name, case number, type and title of document, document number to which the objection refers and the file name on the outside of the envelope.

PLEASE TAKE FURTHER NOTICE, that only those objections that have been timely filed may be considered by the Court.

Objections to be filed by June 26, 2023. Hearing on objections, if any, will be held on July 18, 2023, at 3:30 p.m.

PLEASE TAKE FURTHER NOTICE, that in the event that there is a hearing, the hearing shall not be held in person but shall be held by videoconference using the Zoom platform. Parties have the option to either dial in as an audio only participant using the provided Zoom dial-in number or connect by video using the provided video link. All participants must register with eCourt Appearances in advance of all videoconference appearances. eCourt Appearances registration is required by both attorneys and non-attorney participants. Attorneys with a CM/ECF account may find the program under the "Utilities" menu after logging on to CM/ECF. Those without CM/ECF accounts may access the program on the website at

<https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>. Once registered, eCourt Appearances will email the video link for your hearing. You may register for hearings weeks in advance, but the video link will not be emailed to you until **48 hours before the hearing date**. Those registering with eCourt Appearances for hearings in less than 48 hours should allow up to 15 minutes after registration to receive the email with the video link. Those unable to access eCourt Appearances must email Judge Nancy Hershey-Lord's Courtroom Deputy at: nhl_hearings@nyeb.uscourts.gov at least two (2) business days prior to the hearing. Your email must include your name, the case number(s), who you represent (if you are an attorney), hearing date, and phone number.

Dated: June 6, 2023
Huntington, New York

Respectfully submitted,
Law Offices of Avrum J. Rosen, PLLC

By: /s/ Avrum J. Rosen
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*Proposed Counsel for the Debtor
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